

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

RUDOLPH J. GEIST, *et al.*,

\*

Plaintiffs,

\*

Case No. 8:16-cv-03630-PX

v.

\*

Judge Paula Xinis

HISPANIC INFORMATION AND  
TELECOMMUNICATIONS NETWORK,  
INC.,

\*

\*

Defendant.

\*

\*\*\*\*\*

**SECOND CONSENT MOTION FOR EXTENSION OF TIME  
TO RESPOND TO COMPLAINT**

Defendant the Hispanic Information and Telecommunications Network, Inc., by and through the undersigned counsel and with the agreement and consent of Plaintiffs, hereby moves the Court for a further extension of fifteen (15) days in which to serve a motion or responsive pleading. Pursuant to the Court's Order of November 30, 2016 (Doc. 10), Defendant's motion or responsive pleading currently is due on December 15, 2016. Defendant respectfully requests a further extension until December 30, 2016.

In support of its request, Defendant states that the parties are engaged in settlement discussions which potentially could resolve this matter without the need for further action. Defendant makes this request without waiver of or prejudice to any and all defenses to the Complaint, including any and all of the defenses set forth in Rule 12(b) of the Federal Rules of Civil Procedure and any other argument or defense.

Pursuant to Local Rule 105.9, Plaintiffs have consented to the requested extension until December 30, 2016 and Defendant has provided counsel for Plaintiffs with reasonable notice of the instant motion.

WHEREFORE, Defendant respectfully requests that the Court extend the deadline for Defendant to answer or otherwise respond to the Complaint until December 30, 2016.

Dated: December 14, 2016

Respectfully Submitted,

/s/Tillman J. Finley  
Tillman J. Finley (D. Md. Bar No. 16719)  
MARINO FINLEY PLLC  
1100 New York Avenue, N.W., Suite 700W  
Washington, DC 20006  
Tel: (202) 223-8888  
Fax: (877) 235-3666  
[tfinley@marinofinley.com](mailto:tfinley@marinofinley.com)

*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 14<sup>th</sup> day of December, 2016, copies of the foregoing were sent, via the Court's electronic filing system, to the following counsel of record:

Benjamin G. Chew  
Manatt, Phelps & Phillips, LLP  
1050 Connecticut Avenue, NW, Suite 600  
Washington, DC 20036  
Tel: (202) 585-6511  
Fax: (202) 585-6600  
[bchew@manatt.com](mailto:bchew@manatt.com)

*Counsel for Plaintiffs*

/s/Tillman J. Finley